

REMARKS/ARGUMENTS

The office action of May 1, 2006 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-20 remain in this application.

Claims 1-14 and 17-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent no. 6,606,707 to Hirota et al. ("Hirota"). Claims 15 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hirota in view of U.S. patent no. 5,751,631 to Liu et al. ("Liu"). Applicants respectfully traverse these rejections.

The action alleges that Hirota discloses all the features of independent claims 1 and 8.

To show a file management portion connected to the network interface and configured to manage a relationship between a data file from the network and an address of the memory cell array as recited in claims 1 and 8, the action relies on the command judgment control unit 322 of the memory card 109 described at col. 11, lines 6-10 and shown in Fig. 5 of Hirota. According to Hirota at col. 11, lines 1-5, the command judgment control unit 322 controls the components 321-327 based on an instruction to the memory card 109 input to the command pin. Contrary to the action's contention, the command judgment control unit 322 does not perform file management. Rather, file management is performed in the Hirota system using software stored on the hard disk 120 of the PC 102 as described at col. 9, lines 3-26. Thus, Hirota lacks a teaching or suggestion of a nonvolatile semiconductor memory package or a detachable memory device including a file management portion as recited in claims 1 and 8, respectively.

To show a network interface connectable to a network as recited in claims 1 and 8, the action seemingly points to reference numeral 4 in Figure 5 of Hirota. However, the specification provides no description or disclosure of a reference numeral 4. One skilled in the art would have appreciated that the numeral 4 in Figure 5 merely refers to 4 data signals (DATA1, DATA2, DATA3, DATA4) being input to non-authentication area access control unit 326. Nowhere does Hirota provide any teaching or suggestion of either a nonvolatile semiconductor memory package or a detachable memory device having a network interface as called for in claims 1 and 8, respectively. Moreover, Hirota describes at col. 7, lines 52-56 that the PC 102, not the memory card 109, is connectable to a network. Indeed, the memory card 109 is only shown and

described as being connectable to the PC 102 (Figures 1 and 3) and to a player 201 (Figures 2 and 4).

In view of the above, Hirota fails to teach or suggest a nonvolatile semiconductor memory package including a network interface or file management portion as recited in claim 1. Nor does Hirota teach or suggest a detachable memory device including a network interface or a file management portion as recited in claim 8. For at least these reasons, claims 1 and 8 are patentably distinct from Hirota. Claims 2-7, 17 and 19, which ultimately depend from claim 1, and claims 9-14, 18 and 20, which ultimately depend from claim 8, are patentably distinct from Hirota for the same reasons as their ultimate base claim, and further in view of the additional features recited therein.

Claims 15 and 16, which respectively depend from claims 1 and 8, were rejected over the combination of Hirota and Liu. Notwithstanding the propriety of the combination, Liu fails to remedy the defects of Hirota noted above. For at least this reason, the combination of Hirota and Liu, even assuming proper, does not result in the claim 15 and 16 inventions.

CONCLUSION

If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,
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